

EXHIBIT 2

1 THE HONORABLE JAMES L. ROBART
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7
8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

10 GEORGE JOHNSON,

11 Plaintiff,

12 vs.

13 DONALD P. WANG IN PERSONAM; THE
14 F/V THOR, OFFICIAL NUMBER 224713,
15 HER ENGINES, MACHINERY,
16 APPURTENANCES AND CARGO, IN REM,

17 Defendants

18 Case No. 2:16-cv-01738-JLR

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20 **DECLARATION OF NEIL T. LINDQUIST
21 IN SUPPORT OF PLAINTIFF'S MOTION
22 FOR ATTORNEY FEES**

23 **DECLARATION OF NEIL T. LINDQUIST**

24 1. I am one of the attorneys of record for the plaintiff in the above-entitled cause,
25 have personal knowledge of the matter set forth herein and am competent to testify thereto for
the limited purpose of this motion for attorney fees.

26 2. I have been practicing maritime law for 1.0 years. Since entering the practice last
27 year, I have represented claimants for maritime wages, maritime personal injury and business
disputes.

28 3. When billing by time expended, my standard rate is \$250.00 per hour.

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30 **DECLARATION OF NEIL T. LINDQUIST IN SUPPORT OF PLAINTIFF'S
31 MOTION FOR ATTORNEY FEES - 1
32 CASE NO. 2:16-cv-01738-JLR**

33
34 **THE LAW OFFICE OF NEIL T.
35 LINDQUIST
36 12000 129th Ln. NE Suite #P400
37 Kirkland, Washington 98034
38 T (425) 372-7799**

1 4. As my income is generally garnered through contingent fees, I do not make a
2 normal practice of maintaining contemporaneous time records. Because I am a new attorney
3 and I am not as efficient as some of my more experienced colleagues, I generally applied ninety
4 minutes of work as sixty billable minutes. The sole exception to this is my time expended for
5 trial preparation. Therefore, I believe I have based my reconstruction of expended time on this
6 case with conservative estimates of my actual time expended. I did not include phone calls and
7 emails to and from my client, communications and meetings with John Merriam, or witness
8 interviews. Nor have I included the time spent preparing this motion. I would estimate that the
9 attached time detail represents a reasonable and conservative estimate of the actual time I have
10 spent on this case.

11 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
12 and correct to the best of my knowledge and belief.

13 Dated this 24th day of September, 2018.

/s/ Neil T. Lindquist

Neil T. Lindquist

23 DECLARATION OF NEIL T. LINDQUIST IN SUPPORT OF PLAINTIFF'S THE LAW OFFICE OF NEIL T.
MOTION FOR ATTORNEY FEES - 2 LINDQUIST
CASE NO. 2:16-cv-01738-JLR 12000 12th Ln. NE Suite #B400

THE LAW OFFICE OF NEIL T.
LINDQUIST
12000 129th Ln. NE Suite #P400
Kirkland, Washington 98034
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CERTIFICATE OF SERVICE

I declare under penalty of perjury of the laws of the State of Washington that on the 24th day of September, 2018, I electronically filed the above document with the Clerk of the Court using the E-FILING system which will send notification of such filing to the below addressee(s), and by the additional methods indicated:

Donald P. Wang
392 Loma Drive, Suite 201
Los Angeles, CA 90017
Telephone: (213) 465-5553
Email: skyway420@live.com
Defendant Pro Se

By:
[] U.S. MAIL
[] FACSIMILE
[] HAND DELIVERY
[X] E-FILING
[X] E-MAIL

DATED this 24th day of September, 2018, in Seattle, Washington.

/s/ Karen M. Smart
Karen M. Smart, Paralegal
Law Office of John Merriam

**DECLARATION OF NEIL T. LINDQUIST IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEY FEES - 3**

CASE NO. 2:16-cv-01738-JLR

**THE LAW OFFICE OF NEIL T.
LINDQUIST**

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23 **DETAIL OF TIME EXPENDED BY NEIL
T. LINDQUIST, LEAD COUNSEL FOR
PLAINTIFF**

DATE	ACTIVITY	HOURS
3/29/2018	Review Case File	2.0
4/2/2018	Client Interview	1.0
7/9/2018	Trial Research and Preparation	2.0
7/10/2018	Records Request – Port of Seattle Police	0.5
7/10/2018	Review Order denying discovery motion	0.3
7/11/2018	Review Order denying settlement conference	0.2
7/12/2018	Review Records – Port of Seattle Police	0.3

23 **DETAIL OF TIME EXPENDED BY NEIL T.
LINDQUIST, LEAD
COUNSEL FOR PLAINTIFF - 1
CASE NO. 2:16-cv-01738-JLR**

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LINDQUIST
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DATE	ACTIVITY	HOURS
7/13/2018	Draft Pre-Trial Order	1.5
7/20/2018	Telephone Conversation – Officer Matthew Huston	0.5
7/23/2018	Pretrial Conference with travel time	1.5
7/23/2018	Review Minute Order regarding Pretrial Conference	0.1
7/23/2018	Review Order to Show Cause	0.1
7/24/2018	Trial Preparation	3.0
7/24/2018	Amend Pre-Trial Order	0.5
7/24/2018	Review defendant's Pretrial Order	0.1
7/24/2018	Review Wang's Response to Show Cause Order	0.2
7/25/2018	Review Order regarding Show Cause	0.2
7/27/2018	Email -Donald Wang	0.2
7/27/2018	Amend Pre-Trial Order	0.2
7/27/2018	File Pre-Trial Order	0.2
7/28/2018	Trial Preparation	2.0
7/29/2018	Trial Preparation	2.0
7/30/2018	Trial Preparation	3.0
7/31/2018	Draft Pretrial Order	0.1
7/31/2018	Trial Preparation	3.0
8/01/2018	Review defendant's Opposition to Sanctions	0.5
8/1/2018	Review defendant's trial brief	1.0
8/1/2018	Trial Preparation	3.0
8/02/2018	Review Order of Sanctions	0.2

DETAIL OF TIME EXPENDED BY NEIL T. LINDQUIST, LEAD
COUNSEL FOR PLAINTIFF - 2
CASE NO. 2:16-cv-01738-JLR

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DATE	ACTIVITY	HOURS
8/2/2018	Trial Preparation	3.0
8/3/2018	Trial Preparation	3.0
8/4/2018	Trial Brief – Legal Research	2.0
8/4/2018	Trial Brief – Drafting	2.5
8/5/2018	Trial Brief – Drafting/Editing	4.0
8/6/2018	Trial Brief – Editing/Subnitting	1.5
8/6/2018	Draft and Submit Proposed Findings of Fact and Conclusions of Law	1.5
8/6/2018	Review defendant's Proposed Findings of Fact and Conclusions of Law	0.2
8/7/2018	Trial Preparation	2.5
8/8/2018	Trial Preparation	6.0
8/9/2018	Trial Preparation	8.0
8/10/2018	Trial Preparation	8.0
8/11/2018	Trial Preparation	8.0
8/12/2018	Trial Preparation	8.0
8/13/2018	Trial preparation and trial	10.0
8/14/2018	Trial preparation and trial; post-trial debriefing of George Johnson	8.0
8/15/2018	Damages Brief – Legal Research	3.0
8/16/2018	Damages Brief- Legal Research & Drafting	3.0
8/17/2018	Damages Brief – Drafting	3.0
8/18/2018	Damages Brief – Drafting/editing	2.0

23
**DETAIL OF TIME EXPENDED BY NEIL T. LINDQUIST, LEAD
 COUNSEL FOR PLAINTIFF - 3
 CASE NO. 2:16-cv-01738-JLR**

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DATE	ACTIVITY	HOURS
8/19/2018	Damages Brief – Editing	1.0
8/20/2018	Damages Brief – Editing & Submitting	0.4
8/20/2018	Review Wang's brief on damages	1.0
9/12/2018	Review Findings of Fact and Conclusions of Law	0.3
9/12/2018	Review Opinion	0.5
TOTAL HOURS		119.8

Dated this 24th day of September, 2018.

THE LAW OFFICE OF NEIL T. LINDQUIST

/s/ Neil T. Lindquist
NEIL T. LINDQUIST, WSBA #52111
The Law Office of Neil T. Lindquist
1200 129th Lane NE #P400
Kirkland, WA 98034
Email: Neil@LindquistLegal.com
Tel: 425-372-7799
Attorney for Plaintiff

**DETAIL OF TIME EXPENDED BY NEIL T. LINDQUIST, LEAD
COUNSEL FOR PLAINTIFF - 4
CASE NO. 2:16-cv-01738-JLR**

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